

Renee Beckham

February 13, 2025

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF TEXAS
 HOUSTON DIVISION

3 FOOD NOT BOMBS HOUSTON §
4 ET AL., §
 §
5 Plaintiffs, § Case No. 4:24-cv-338
 §
6 v. § (Consolidated Case: No.
 § 4:23-cv-1206)
7 CITY OF HOUSTON, TEXAS, §
 §
8 Defendant. §

9
10 ORAL DEPOSITION OF

11 RENEE BECKHAM

12 FEBRUARY 13, 2025

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14
15 ORAL DEPOSITION OF RENEE BECKHAM, produced as a
16 witness at the instance of the Plaintiffs and duly
17 sworn, was taken in the above styled and numbered cause
18 on Thursday, February 13, 2025, from 9:10 a.m. to
19 2:49 p.m., before DONNA QUALLS, Notary Public in and for
20 the State of Texas, Notary ID No. 12161359, reported by
21 computerized stenotype machine, at the offices of
22 Houston City Hall Annex, 900 Bagby Street, 4th Floor,
23 Houston, Texas, pursuant to the Federal Rules of Civil
24 Procedure, and any provisions stated on the record or
25 attached hereto.

EXHIBIT

D

1 aware that, the last time someone may have inspected,
2 they inspected the site where the product was being
3 prepared.

4 Q. Okay. So to your knowledge, the last time that
5 investigation happened was in 2018?

6 A. Only -- the only two at the -- at 500 McKinney.
7 And I don't know if y'all have that complaint
8 investigated by Mr. Bradshaw.

9 Q. Yes. Let's turn to that.

10 A. Right.

11 Q. All right. I'm handing you what I marked at
12 Exhibit No. 45.

13 (Exhibit No. 45 was marked.)

14 Q. (BY MR. HIROSHIGE) And I apologize. The text
15 on here is pretty small, but this is just like the way
16 it printed.

17 Do you see at the top here there's a -- it
18 says date received 04-01-2020?

19 A. Yes.

20 Q. And underneath that it says "EHS assigned:
21 Jerry Bradshaw"?

22 A. Yes.

23 Q. Okay. So at the very start of this deposition,
24 you mentioned that you would review some complaints in
25 preparation for your testimony today?

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1 A. Uh-huh.

2 Q. Is this one of the documents you reviewed?

3 A. Yes.

4 Q. And just now, this is the investigation by
5 Jerry Bradshaw you were referring to?

6 A. Yes.

7 Q. And who is Jerry Bradshaw?

8 A. He's -- he's one of the chief sanitarians now.

9 Q. Okay. And at the time in April of 2020, what
10 was his role?

11 A. He was probably just a supervisor. Probably
12 just a sanitation supervisor in 2020.

13 Q. Okay. And then at the top here it says
14 "Facility Name: Central Library. Address:
15 500 McKinney."

16 Do you see that?

17 A. Right. Yes.

18 Q. And under service requested it reads "I'd like
19 to report unsanitary conditions at a food distribution
20 site at the Houston Public Library. 500 McKinney
21 Street, Houston, Texas 77002. There's a group that sets
22 up and distributes food to the homeless every Monday,
23 Wednesday, and Friday at 7:30 p.m. at the main downtown
24 library. Until last night, they were distributing food
25 in front of city hall but are now back at the library.

1 They also distribute lunch every day at 4:00 p.m. They
2 are set up on the Lamar Street of the library near the
3 intersection of Lamar Street and Brazos."

4 Have I read that correctly so far?

5 A. I got it.

6 Q. Are you following along -- okay.

7 And then it says "The issue is the site
8 where the food is distributed is totally unsanitary. It
9 totally reeks of urine on the brick wall and pavement,
10 and there are human feces in the flower beds and along
11 the perimeter of the library property. Basically, this
12 group is serving food in a toilet. You can easily smell
13 the noxious odors.

14 "The group does not enforce quarantine
15 spacing requirements. And there are about 200 people
16 out there every night confined to a small unsanitary
17 area. Some of the people that" -- "food recipients are
18 obviously sick with coughing, spitting, and sneezing.
19 The people serving the food do not have gowns or proper
20 masks, but they do wear gloves. The homeless may serve
21 to infect the people serving the food to spread the
22 infection onto others.

23 "I'm requesting that you inspect this food
24 distribution center site and have the area sanitized
25 with power washers and feces removal. And until such

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1 time that the unsanitary conditions are resolved, halt
2 the distribution of food in these unsanitary
3 conditions."

4 Did I read that right?

5 A. Yes.

6 Q. Okay. So this -- so this complaint isn't about
7 the food that's being provided outside the library; is
8 that right?

9 A. Right.

10 Q. It's about the environment where the food is
11 being provided, right?

12 A. Yes.

13 Q. And when this complainant refers to infection,
14 do you understand that to be referring to COVID-19?

15 A. Yes.

16 Q. Okay. And as we -- so now if you turn or look
17 with me to the investigation report records.

18 Do you see that section?

19 A. Yes.

20 Q. And it says the investigator is Jerry Bradshaw,
21 right?

22 A. Uh-huh.

23 Q. And it looks like he investigated this
24 complaint on April 3rd, 2020; is that right?

25 A. Yes.

1 Q. I'm going to read the investigation report
2 records. It says "Surveyed downtown library site for
3 homelessness feeding event. Observed sidewalk with
4 separating lines of chalk with the distance of 6- to
5 7-foot increments. Observed men and women standing,
6 waiting for food service.

7 "I interviewed the person in charge of
8 organization, Food Not Bombs subgroup Coronavirus Relief
9 Meals, Shere Dore. Ms. Dore stated a wait for food to
10 be delivered for the feeding. I explained to Ms. Dore
11 the need for separation of the recipients of the food as
12 a order from the mayor. Ms. Dore was in agreement and
13 will work it and ensure social distant rule.

14 "There was average around 95 people waiting
15 for food from Express in Spring, Texas. The food
16 temperature was 103 degrees. The food is packaged in
17 hinged carry-out Styrofoam containers covered in a
18 plastic T-shirt-style carry bag.

19 "Ms. Dore's group gave out numbers to the
20 men and women respective to the number of meals. There
21 were only 65 meals given. Ms. Dore group ensured social
22 distance was maintained as the recipient number was
23 called. Ms. Dore group ensured waste was removed while
24 in our presence.

25 "I observed Ms. Dore group was not listed

1 on the approved charitable feeding list. I e-mailed her
2 information on obtaining approval."

3 Did I read that correctly?

4 A. Yes.

5 Q. And so Jerry Bradshaw spoke with Ms. Dore at a
6 feeding outside the Central Library; is that right?

7 A. Yes.

8 Q. And he observed that there were sidewalks --
9 chalk lines in the sidewalk for social distancing?

10 A. Uh-huh.

11 Q. Is that --

12 A. Yes.

13 Q. Okay. And Mr. Bradshaw shared with Ms. Dore
14 that there needed to be social distancing because of the
15 pandemic; is that right?

16 A. Yes.

17 Q. And according to Mr. Bradshaw, Ms. Dore ensured
18 that everyone in line abided by social distancing rules
19 while they were receiving food; is that right?

20 A. Yes.

21 Q. And according to Mr. Bradshaw, Ms. Dore ensured
22 that the waste from the charitable feeding was removed
23 at the end; is that right?

24 A. Yes.

25 Q. And then at the bottom of this report, it lists

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1 outcome. And then do you see at the very bottom it says
2 date closed, 4-5-2020?

3 A. Yes.

4 Q. And the request disposition, it was resolved?

5 A. Yes.

6 Q. What does it mean for the outcome to be
7 resolved?

8 A. It means that the conditions may or may not
9 have existed. And based on the inspector's
10 investigation, it's been corrected.

11 Q. Okay. So it means Mr. Bradshaw did not have
12 any continuing concerns about the charitable feedings
13 outside the library after his investigation, right?

14 A. Not that I'm aware of.

15 Q. Okay. Now, you talked about a 2018 moment
16 where the health department -- where you investigated a
17 group that was serving meals across the street from --

18 A. The Beacon.

19 Q. -- The Beacon. And then we've also reviewed
20 this 2020 investigation by Jerry Bradshaw of a Food Not
21 Bombs feeding outside the Central Library, right?

22 A. Right.

23 Q. Now, aside from those two instances, are you
24 aware of any other instances where the health department
25 investigated a charitable feeding?

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1 A. One ongoing. I think I mentioned Loaves &
2 Fishes earlier.

3 Q. Okay.

4 A. In their -- I guess in their patio, we got a
5 complaint. The weekend inspector went out there, and
6 they were -- the organization -- I don't remember the
7 name of the organization. They weren't feeding them in
8 accordance with food safety. So there was issues with
9 the manner of which the food was being provided or
10 uncovered food. So you're serving buffet style, and you
11 have food just totally exposed.

12 Q. And when you -- so was it -- do you know if
13 Loaves & Fishes authorizes other groups to provide
14 charitable feedings on their patio?

15 A. This was the first that I had heard --

16 Q. Okay.

17 A. -- that they even had charitable feeding on
18 their property because they have a kitchen. But I think
19 on Sundays or Sunday mornings they don't feed. So
20 that's probably why they do that.

21 Q. And Loaves & Fishes itself provides meals to
22 homeless people during the week, right?

23 A. Yes.

24 Q. But it provides those meals on their own
25 property?

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ERRATA PAGE

WITNESS NAME: RENEE BECKHAM DATE: 02/13/2025

PAGE LINE CHANGE REASON

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1 I, RENEE BECKHAM, have read the foregoing
2 transcript and hereby affix my signature that same is
3 true and correct, except as noted above on the previous
4 pages(s), and that I am signing this before a Notary
5 Public.

6 RENEE BECKHAM

7 THE STATE OF)
8 COUNTY OF)

9 Before me, , on this day
10 personally appeared, RENEE BECKHAM, known to me or
11 proved to me under oath or through
12 (description of identity card or other document), to be
the person whose name is subscribed to the foregoing
instrument and acknowledged to me that they executed the
same for the purposes and consideration therein
expressed.

13 Given under my hand and seal of office on this, the
14 _____ day of , 2025.

15
16 Notary Public in and for
17 The State of Texas
18 Commission Expires: _____
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REPORTER'S CERTIFICATION
ORAL DEPOSITION OF
RENEE BECKHAM
TAKEN FEBRUARY 13, 2025

I, DONNA QUALLS, Shorthand Reporter and Notary
Public in and for the State of Texas, Notary ID
No. 12161359, hereby certify to the following:

That the witness, RENEE BECKHAM, was duly
sworn by the officer and that the transcript of the oral
deposition is a true record of the testimony given by
the witness;

That the original deposition was delivered to
RANDALL HIROSHIGE;

That a copy of this certificate was served on
all parties and/or the witness shown herein on

_____.

I further certify that pursuant to FRCP No.
30(f)(i) that the signature of the deponent was
requested by the deponent or a party before the
completion of the deposition and that the signature is
to be returned within 30 days from date of receipt of
the transcript. If returned, the attached Changes and
Signature Page contains any changes and the reasons
therefor.

I further certify that I am neither counsel

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1 for, related to, nor employed by any of the parties in
2 the action in which this proceeding was taken, and
3 further that I am not financially or otherwise
4 interested in the outcome of the action.

5 Certified to by me this 28th day of February,
6 2025.

7 
8

9
10 DONNA QUALLS
11 Notary Public in and for
12 The State of Texas, Notary ID 12161359
13 My Commission expires 11/06/2026

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